

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

FILED

2016 FEB 16 P 3:03

UNITED STATES OF AMERICA

v.

SAMIN CHANG  
RICHARD A. YANG  
ILHWAN CHA  
KI T. KWON  
BRIAN LEE  
ZIPORA SARDJULI  
DODDY SAMBUAGA  
IRWAN ANWAR

Defendants.

Criminal Case No. \_\_\_\_\_

In Violation of:

21 U.S.C. § 846  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)  
18 U.S.C. § 2  
21 U.S.C. § 856(a)(1)

CR 15-845

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT I

(Conspiracy to manufacture a controlled substance, marijuana)

Between December 1, 2012 and August 12, 2015, in the District of Rhode Island and elsewhere, the defendants, SAMIN CHANG, RICHARD A. YANG, ILHWAN CHA, KI T. KWON, BRIAN LEE, ZIPORA SARDJULI, IRWAN ANWAR and DODDY SAMBUAGA together with others known and unknown to the grand jury, did knowingly, intentionally, and willfully combine, conspire, confederate, and agree with each other to manufacture marijuana, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1);

(Quantity of Controlled Substance)

With respect to SAMIN CHANG, RICHARD A. YANG, ILHWAN CHA, KI T. KWON, IRWAN ANWAR and DODDY SAMBUAGA the number of marijuana plants involved in the conspiracy attributable to each, as a result of their individual conduct and the conduct of their coconspirators, reasonably foreseeable to them, is more than one-hundred plants in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B);

With respect to BRIAN LEE and ZIPORA SARDJULI the number of marijuana plants involved in the conspiracy attributable to each, as a result of their individual conduct and the conduct of their coconspirators, reasonably foreseeable to them, is more than fifty plants 21 U.S.C. § 841(a)(1) and (b)(1)(C);

All in violation of 21 U.S.C. § 846.

**COUNT II**

Between December 1, 2012 and August 12, 2015, in the District of Rhode Island and elsewhere, the defendants, SAMIN CHANG, RICHARD A. YANG, ILHWAN CHA, KI T. KWON, IRWAN ANWAR and DODDY SAMBUAGA did knowingly and intentionally manufacture 100 or more marijuana plants, a Schedule I Controlled Substance, , in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

**COUNT III**

Between December 1, 2012 and August 12, 2015, in the District of Rhode Island and elsewhere, the defendants, BRIAN LEE, ZIPORA SARDJULI did knowingly and intentionally manufacture 50 or more marijuana plants, a Schedule I Controlled Substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

**COUNT IV**

(Using/Maintaining a Drug Involved Premises)

Beginning on a date unknown, but not later than December 1, 2012, and continuing until August 12, 2015, in the District of Rhode Island, defendants SAMIN CHANG, RICHARD A. YANG, ILHWAN CHA, KI T. KWON, BRIAN LEE, ZIPORA SARDJULI, IRWAN ANWAR and DODDY SAMBUAGA knowingly leased, rented, used and maintained, permanently or temporarily, commercial space located at 725 Branch Avenue in Providence, Rhode Island, for the purpose of unlawfully manufacturing a controlled substance, to wit marijuana, and did aid and abet such conduct, in violation of 21 U.S.C. § 856(a)(1) and 18 U.S.C. §2.

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts I - IV of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of 21 U.S.C. §§ 841 and 846, the defendants, SAMIN CHANG, RICHARD A. YANG, ILHWAN CHA, KI T. KWON, BRIAN LEE, ZIPORA SARDJULI, IRWAN ANWAR and DODDY SAMBUAGA, shall forfeit to the United States of America any property constituting, or derived

from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses alleged in this Indictment. The property to be forfeited includes, but is not limited to, the following:

396 Roosevelt Avenue, Central Falls, Rhode Island, and further referred to in the Records of Land Evidence City of Central Falls, Book 863, Page 286, as follows:

All that certain Lot, or parcel of land with all the buildings and improvements thereon, situated on the northwesterly corner of Roosevelt Avenue, formerly Mill Street, and Clay Street in the City of Central Falls, County of Providence, State of Rhode Island, bounded and described as follows:

Beginning at the intersection of said northerly line of Clay Street and the westerly line of Roosevelt Avenue, being the southeasterly corner of the premises herein described; thence running westerly bounding southerly by the northerly line of said Clay Street one hundred (100) feet to the southeasterly corner of land now or formerly of American Broadloom & Braided Rug Co.; thence turning and running northerly bounded westerly by said American Broadloom & Braided Rug Co. land sixty (60) feet for a corner; thence turning and running easterly bounded northerly by said American Broadloom & Braided Rug Co. land one hundred (100) feet to a point in the westerly line of said Roosevelt Avenue; thence turning and running southerly along the westerly line of said Roosevelt Avenue sixty (60) feet to the point and place of beginning.

3. If any of the property described above, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

PETER F. NERONHA,  
United States Attorney

A TRUE BILL:

**REDACTED**

  
WILLIAM J. FERLAND  
Assistant U.S. Attorney

  
STEPHEN G. DAMBRUCH  
First Assistant U.S. Attorney

Date: 2/16/16

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 15-CR-00084

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person  
Furnishing Information on  
THIS FORM PETER F. NERONHA  
☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. (401) 709-5000Name of Asst.  
U.S. Attorney  
(if assigned) WILLIAM J. FERLAND

USA vs.

Defendant: SAMIN CHANG

Address:

☐ InteBirth  
Date 1

Social S

REDACTED

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Federal Bureau of Investigation (FBI) Colin Woods, S.A.

☐ person is awaiting trial in another Federal or State Court  
(give name of court)☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.Place of  
offense RHODE ISLAND CountyIssue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☒ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
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			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Trial: 1 week

**OFFENSE CHARGED – U.S.C. CITATION – STATUTORY MAXIMUM PENALTIES –  
ADDITIONAL INFORMATION OR COMMENTS**

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Count Breakdown	Title & Section/Offense Level (Petty = 1/ Misdemeanor = 3/ Felony = 4)	Description of Offense Charged	Felony/Misd.
1	21 U.S.C. 846	Conspiracy to manufacture a controlled substance	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$1,000,000; Special Assessment: \$100		
2	21 U.S.C. 841 (a)(1) and (b)(1)(B)	Manufacturing a controlled substance, to wit over 100 marijuana plants.	<b>FELONY</b>
	Imprisonment: 40 yrs; Supervised release: 4 yrs; Fine: \$500,000; Special Assessment: \$100		
4	21 U.S.C. 856(a)(1) and 18 U.S.C. 2	Using/Maintaining a Drug Involved Premises	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$500,000; Special Assessment: \$100		

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UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person PETER F. NERONHA  
Furnishing Information on ☒ U.S. Atty ☐ Other U.S. Agency  
THIS FORM Phone No. (401) 709-5000

Name of Asst. WILLIAM J. FERLAND  
U.S. Attorney  
(if assigned)

USA vs.

Defendant: RICHARD A. YANG

Address

☐ In

Birth  
Date

REDACTED

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Social

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Name of Complainant Agency, or Person (& Title, if any)  
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(give name of court)

☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District

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previously dismissed which were  
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☐ U.S. Atty ☐ Defense

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pending case involving this same  
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Case must still be filed with the  
Clerk.)

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before U.S. Magistrate Judge  
regarding this defendant were  
recorded under

SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.  
P.A.S. 15-MJ-265

Place of  
offense RHODE ISLAND

County

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date 8/13/2015 or Date Transferred to Federal Custody

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☒ Currently on bond☐ Fugitive

Defense Counsel (if any): Joseph J. Voccola, Esq.

☐ FPD ☐ CJA ☒ RET'D☐ Appointed on Target Letter☒ This report amends AO 257 previously submitted

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Trial: 1 week



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UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person  
Furnishing Information on  
THIS FORM PETER F. NERONHA  
☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. (401) 709-5000

Name of Asst.  
U.S. Attorney WILLIAM J. FERLAND  
(if assigned)

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SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.

Place of  
offense RHODE ISLAND County

USA vs.

Defendant: ILHWAN "ERIC" CHA

Address:

☐ Int

Birth  
Date

Social

REDACTED

Issue: ☒ Warrant ☐ Summons

Location Status:

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 UNITED STATES DISTRICT COURT RHODE ISLAND  
 DISTRICT OF RHODE ISLAND Divisional Office

 Name and Office of Person  
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 THIS FORM PETER F. NERONHA  
☒ U.S. Atty ☐ Other U.S. Agency  
 Phone No. (401) 709-5000

 Name of Asst.  
 U.S. Attorney WILLIAM J. FERLAND  
 (if assigned)

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SHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.
 Place of  
 offense RHODE ISLAND County

USA vs.

Defendant: KI "TEDDY" T. KWON

Address:

☐ Inter
 Birth  
 Date 1/1

Social Sec

REDACTED

Issue: ☒ Warrant ☐ Summons

Location Status:

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Trial: 1 week

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UNITED STATES DISTRICT COURT RHODE ISLAND

DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person  
Furnishing Information on  
THIS FORM PETER F. NERONHA

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst.  
U.S. Attorney WILLIAM J. FERLAND

(if assigned)

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Place of  
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County

USA vs.

Defendant: BRIAN LEE

Address

☐ Int

Birth  
Date

Social S

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Trial: 1 week

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UNITED STATES DISTRICT COURT RHODE ISLAND

DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person  
Furnishing Information on  
THIS FORM PETER F. NERONHA

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst.  
U.S. Attorney WILLIAM J. FERLAND  
(if assigned)

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
Federal Bureau of Investigation (FBI) Colin Woods, S.A.

☐ person is awaiting trial in another Federal or State Court  
(give name of court)

☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)

☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded under

SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.

Place of  
offense RHODE ISLAND County

USA vs.

Defendant: ZIPORA SARDJULI

Address:

☐ Int

Birth  
Date 7

Social S

REDACTED

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date or Date Transferred to Federal Custody

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☒ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Trial: 1 week



**OFFENSE CHARGED – U.S.C. CITATION – STATUTORY MAXIMUM PENALTIES –  
ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts: 3

Count Breakdown	Title & Section/Offense Level (Petty = 1/ Misdemeanor = 3/ Felony = 4)	Description of Offense Charged	Felony/Misd.
1	21 U.S.C. 846	Conspiracy to manufacture a controlled substance	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$1,000,000; Special Assessment: \$100		
3	21 U.S.C. 841 (a)(1) and (b)(1)(C)	Manufacturing a controlled substance, marijuana plants.	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 4 yrs; Fine: \$5,000,000; Special Assessment: \$100		
4	21 U.S.C. 856(a)(1) and 18 U.S.C. 2	Using/Maintaining a Drug Involved Premises	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$500,000; Special Assessment: \$100		

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 15-CR-00084

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☒ Superseding ☐ Defendant Added

☒ Indictment ☐ Charges/Counts Added

☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND

DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person  
Furnishing Information on  
THIS FORM ☒ U.S. Atty ☐ Other U.S. Agency

Phone No. (401) 709-5000

Name of Asst.  
U.S. Attorney  
(if assigned) WILLIAM J. FERLAND

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before U.S. Magistrate Judge  
regarding this defendant were  
recorded under

SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.

Place of  
offense RHODE ISLAND County

USA vs.

Defendant: DODDY "JIM" SAMBUAGA

Address:

☐ Interp

Birth  
Date 12/

Social Sec

REDACTED

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date 9/22/2015 or Date Transferred to Federal Custody

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): Dixon Acosta, Esq.

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☒ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3

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			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Trial: 1 week

**OFFENSE CHARGED – U.S.C. CITATION – STATUTORY MAXIMUM PENALTIES –  
ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts: 3

Count Breakdown	Title & Section/Offense Level (Petty = 1/ Misdemeanor = 3/ Felony = 4)	Description of Offense Charged	Felony/Misd.
1	21 U.S.C. 846	Conspiracy to manufacture a controlled substance	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$1,000,000; Special Assessment: \$100		
2	21 U.S.C. 841 (a)(1) and (b)(1)(B)	Manufacturing a controlled substance, to wit over 100 marijuana plants.	<b>FELONY</b>
	Imprisonment: 40 yrs; Supervised release: 4 yrs; Fine: \$500,000; Special Assessment: \$100		
4	21 U.S.C. 856(a)(1) and 18 U.S.C. 2	Using/Maintaining a Drug Involved Premises	<b>FELONY</b>
	Imprisonment: 20 yrs; Supervised release: 3 yrs; Fine: \$500,000; Special Assessment: \$100		